

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: JOSEPH M A CHARLES

) Case No. 19 B 08467  
)  
Debtor ) Chapter 13  
)  
) Judge: JACQUELINE P COX

NOTICE OF MOTION

JOSEPH M A CHARLES

9130 S MARQUETTE AVE  
CHICAGO, IL 60617

DAVID M SIEGEL  
via Clerk's ECF noticing procedures

Please take notice that on June 24, 2019 at 10:30 am my designee or I will appear before the Honorable Judge JACQUELINE P COX at 219 South Dearborn Courtroom 680, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on June 06, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On March 25, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Gave business packet; amend plan - #2.3 - for refund language; #5.2 - for student loans and need primary residence language.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
(312) 294-5900

/s/ Tom Vaughn